

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

_____	:	Case No. 18-12457- MDC
IN RE: Cristine A. Handler,	:	Chapter 13
	:	
	:	DEBTOR'S MOTION FOR
Debtor	:	VOLUNTARY DISMISSAL OF
_____	:	CHAPTER 13 CASE

DEBTOR, moves this honorable Court for an order dismissing the above titled bankruptcy case pursuant to 11 U.S.C. §1307(b) and Local Rule 1017-2(a) and avers as follows:

1. Debtor commenced this voluntary case under Chapter 13 and the case has not been converted under 11 U.S.C. §§ 706, 1112, or 1208;
2. Debtor has made no arrangements or agreements with any creditor or other person in connection with this motion for dismissal.
3. Debtor has obtained a loan modification with second mortgage holder that cures all arrears.
4. Debtor will seek state court remedies as necessary to vacate state court foreclosure judgment.

WHEREFORE, Debtor requests this Court grant an ORDER Dismissing the case without prejudice.

August 22, 2019

/s/ Paul A R Stewart  
Attorney for Debtor

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**ORDER**

AND NOW, upon review of Debtor's Motion for Voluntary Dismissal of Chapter 13

Case, it is ORDERED the case is DISMISSED without Prejudice

BY THE COURT

\_\_\_\_\_  
MAGDELINE D COLEMAN, JUDGE

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing Debtor's Motion for Voluntary Dismissal of Chapter 13 Case was served on August 22, 2019 by means of the Court's CM/ECF system upon the following:

**United States Trustee**  
833 Chestnut Street, Suite 500  
Philadelphia, PA 19107

**William C. Miller, Esquire (Trustee)**  
Chapter 13 Trustee  
111 S. Independence Mall, Suite 583  
Philadelphia, PA 19106  
and  
1234 MARKET STREET, SUITE 1813  
PHILADELPHIA, PA 19107

Kevin G. McDonald, Esquire  
KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 19106

/S/ Paul A.R. Stewart, Esquire

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